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March 2, 1998

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VIA HAND DELIVERY

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Secretary

Federal Communications Commission

1919 M Street, N.W., Room 222

Washington, D.C. 20554

Re: Dkt. 97-251, RM-9199
KLXK(FM), Breckenridge, TX
Comments

RECEIVED

MAR 2 - 1998

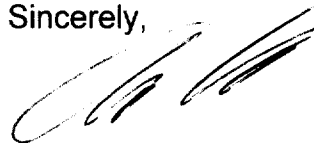
Federal Communications Commission
Office of Secretary

Dear Ms. Salas:

Transmitted herewith, on behalf of Big Country Radio, Inc., licensee of KLXK(FM), Breckenridge, Texas, are an original and four copies of its Comments in the above-referenced rulemaking proceeding to amend the FM table of allotments to substitute Channel 228C3 for Channel 228C2 at Breckenridge, Texas, reallocate Channel 228C3 from Breckenridge to Graford, Texas, and modify KLXK(FM)'s license to specify operation on Channel 228C3 at Graford.

If questions arise, please contact the undersigned attorney.

Sincerely,



Ann Bavender
Counsel for Big Country Radio, Inc.

Enclosure

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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MAR - 8 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Dkt. No. 97-251
of the Commission's Rules,)	RM-9199
FM Table of Allotments)	
(Breckenridge and Graford, Texas))	

To: Chief, Allocations Branch

COMMENTS

Big Country Radio, Inc. ("Big Country"), licensee of KLXK(FM), Breckenridge, Texas, by its attorneys, hereby submits its comments in response to the Notice Of Proposed Rule Making ("NPRM") released January 9, 1998 in the above-captioned rulemaking proceeding in which it is proposed to substitute Channel 228C3 for Channel 228C2 at Breckenridge, Texas, reallocate Channel 228C3 to Graford, Texas, and modify KLXK(FM)'s license to change the community of license from Breckenridge, Texas to Graford, Texas to provide a first local service to Graford.

1. Big Country hereby incorporates by reference its Petition For Rulemaking ("Petition") filed in this proceeding. As demonstrated in the Petition, the aforementioned substitution, reallocation, and modification will serve the public interest by providing Graford with its first local service.


2. Big Country restates its present intention to apply for authorization to modify KLXK(FM)'s facilities if the requested substitution, reallocation, and modification are made. If granted, Big Country will promptly construct the authorized facilities.

3. Big Country submits the attached engineering statement of James McWain in response to the NPRM's request for additional information.

WHEREFORE, for the foregoing reasons, the Commission should substitute Channel 228C3 for Channel 228C2 at Breckenridge, Texas, reallocate Channel 228C3 to Graford, Texas, and modify KLXK(FM)'s license to change the community of license from Breckenridge, Texas to Graford, Texas.

Respectfully submitted,

BIG COUNTRY RADIO, INC.

By: 
Ann Bavender
Its Attorney

Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street, 11th Floor
Arlington, Virginia 22209
(703) 812-0400

March 2, 1998

Technical Exhibit

Comments in support of
Petition for Rulemaking

KLXK Breckenridge, TX (228C2) to Graford, Tx (228C3)

SUMMARY

This exhibit was prepared to present additional technical information for Big Country Radio, Inc. in support of a petition to amend the Table Of Allocations (Section 73.202 (b) of the Rules).

List of Exhibits:

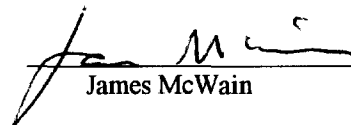
E-II	Page 1	Services in Loss Gain Areas.
	Page 2	Results of Study
		Population Study
	Page 3	Map of Loss Area-Services
	Page 4	Map of Gain Area-Services
	Page 5	Distance to Contour (Graford 228C3)
	Page 6	Distance to Contour (KLXK Present 228C3)

DECLARATION

I, JAMES McWAIN, declare that;

1. That I am the Technical Director of Big Country Radio, Inc.
2. That all statements and representations of fact contained in this technical exhibit are true and correct of my own knowledge.

Date: February 26, 1998


James McWain

Big Country Radio, Inc.
College Station, TX

EXHIBIT E-II

Page 1

Services in Loss-Gain Areas

Big Country Radio, Inc conducted a study to determine the service within the loss and gain areas. The 2 mv/m contours were calculated for AM stations and the 1mv/m contours were calculated for FM stations. The stations with contours that overlapped the loss or gain areas are listed:

Stations with service in Loss Area:

WBAP --- 820 AM-- Fort Worth, TX
KSWA --- 1330 AM-- Graham, TX
KVRP --- 1400 AM-- Stamford, TX
KROO --- 1430 AM-- Breckenridge, TX
KEAS --- 1590 AM-- Eastland, TX
KVRP--- 95.5 FM--Haskell, TX
KVMX-- 96.7 FM-- Eastland, TX
KCDD-- 103.7 FM-- Hamlin, TX
KEAN-- 105.1 FM-- Abilene, TX
KEAS-- 97.7 FM-- Eastland, TX
KMRT-- 106.7 FM-- Granbury, TX
KEYJ--- 107.9 FM-- Abilene, TX

Stations with service in Gain Area:

WBAP --- 820 AM-- Fort Worth, TX
KWFT --- 990 AM-- Wichita Falls, TX
KRLD --- 1080 AM-- Dallas, TX
KJSA --- 1140 AM-- Mineral Wells, TX
KZEE --- 1220 AM-- Weatherford, TX
KSWA --- 1330 AM-- Graham, TX
KNIN --- 92.9 FM-- Wichita Falls, TX
KYXS --- 95.9 FM-- Mineral Wells, TX
KHCK --- 99.1 FM-- Denton, TX
KLUR --- 99.9 FM-- Wichita Falls, TX
KJKB --- 101.7 FM-- Jacksboro, TX
KRNH --- 105.7 FM-- Decatur, TX
KWKQ --- 107.1 FM-- Graham, TX

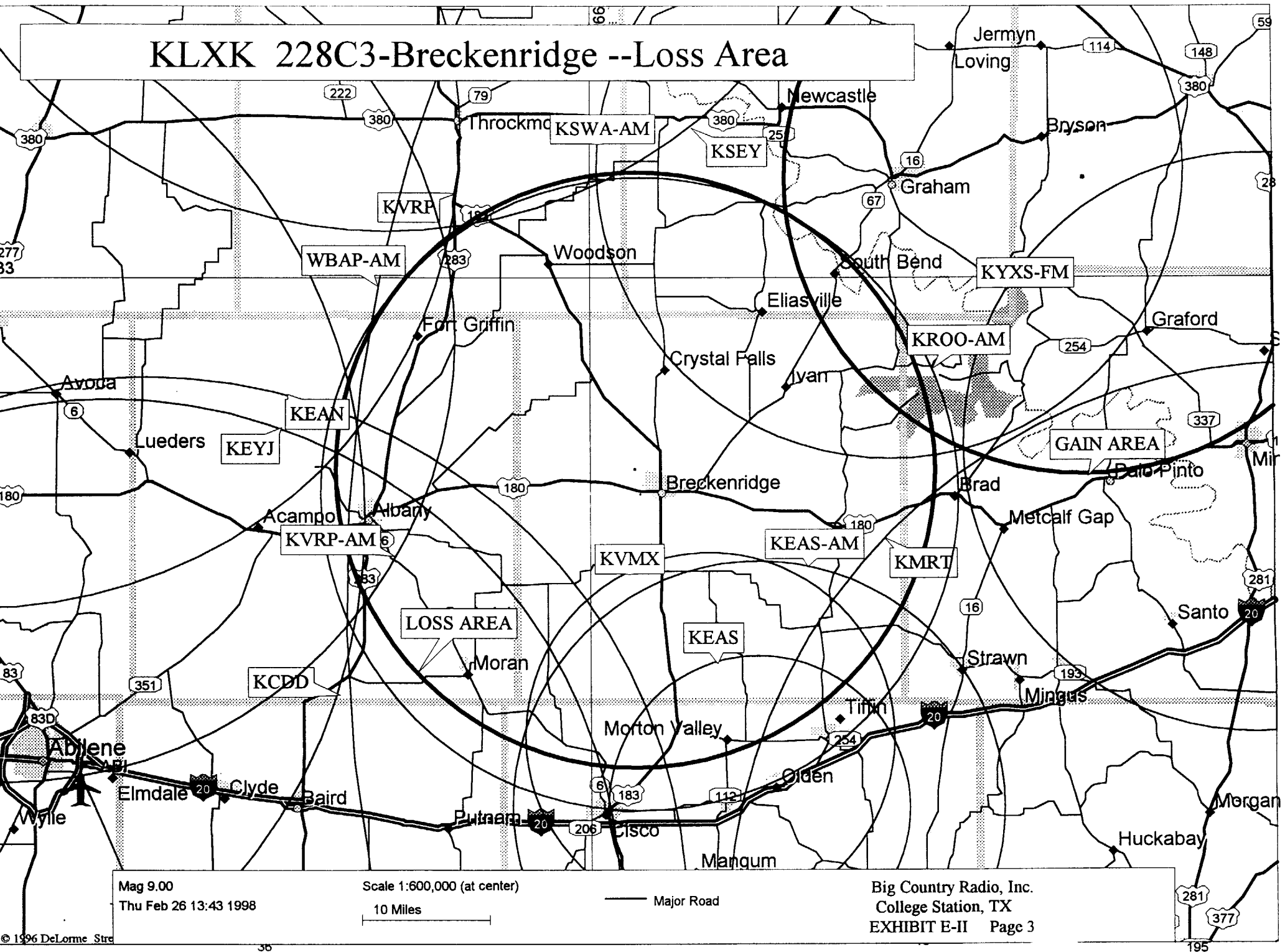
Big Country Radio, Inc.
College Station, TX

EXHIBIT E-II
Page 2

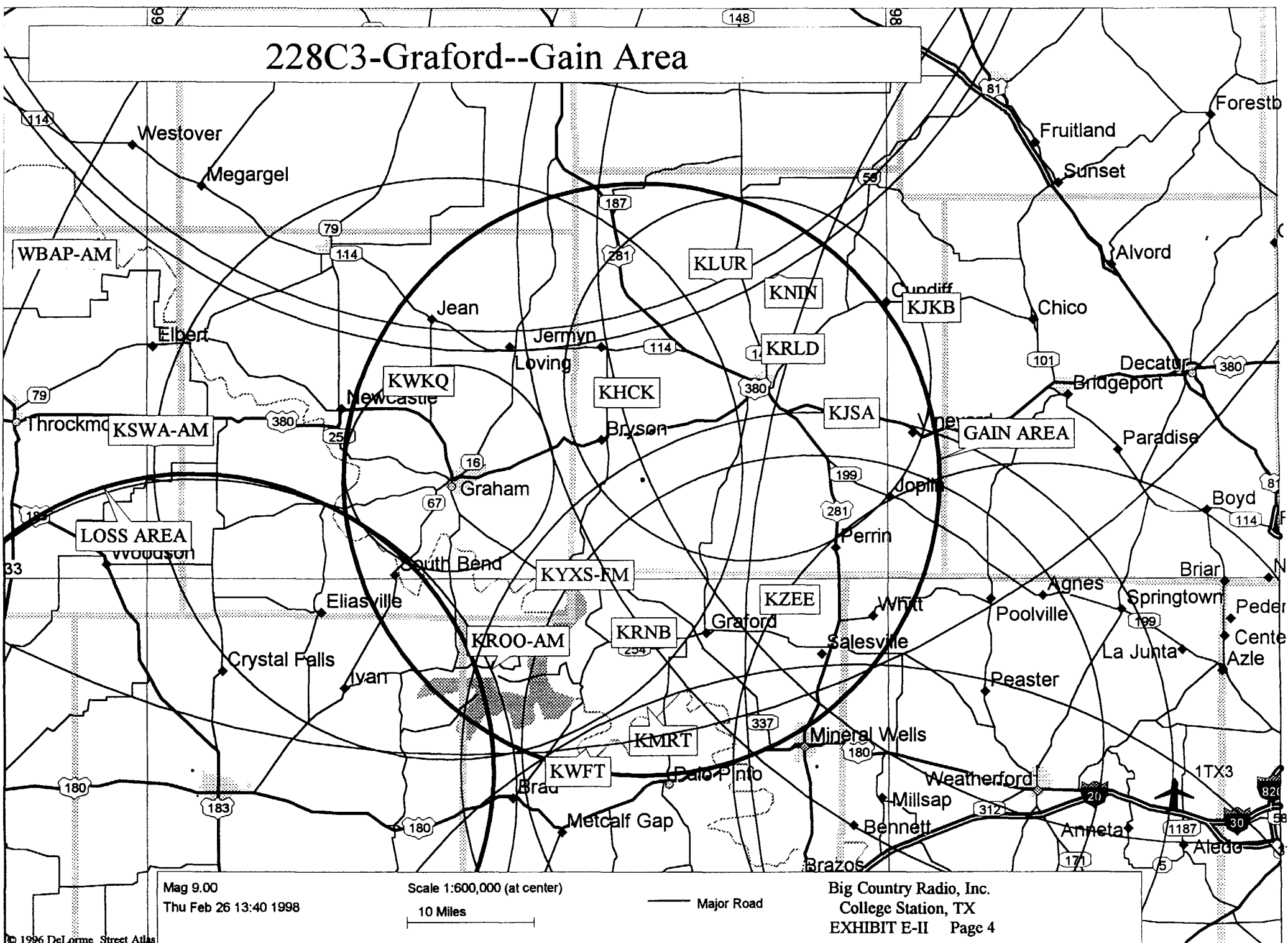
Results of Study
(After allocating 228C3 to Graford, TX)

Loss Area		
Number of Services	Area (km Squared)	% of Total Area
2	1566	34.9
3	1181	26.3
4	1097	24.5
5 or more	642	14.3
Gain Area		
3	180	4.3
4	1016	24.4
5	548	13.1
6	622	14.9
7	672	16.1
8	433	10.4
9	674	16.2
10	23	0.6

KLXX 228C3-Breckenridge --Loss Area



228C3-Graford--Gain Area



Big Country Radio, Inc
College Station, TX
EXHIBIT E-II
Page 5

Distance to Contour

Title: Graford
Audit File: con10087.A01
Based on 3 Second Terrain Data
Reference City: GRAFORD, TX

Latitude: 33-06-51
Longitude: 98-19-57

True Radial Bearing	Radiation Center		Effective Radiated Power		Distance to Contour	
	Average Elevation	Height Above Average Terrain			70.0 dBu F(50,50)	60.0 dBu F(50,50)
Degrees	meters	meters	kW	dBk	km	km
0.00	383.8	84.5	25.000	13.979	21.38	36.29
45.00	364.0	104.4	25.000	13.979	23.71	39.78
54.30	366.7	101.6	25.000	13.979	23.41	39.34
90.00	358.6	109.8	25.000	13.979	24.28	40.60
135.00	339.9	128.4	25.000	13.979	25.93	43.11
157.90	352.7	115.6	25.000	13.979	24.84	41.44
180.00	381.2	87.1	25.000	13.979	21.70	36.78
225.00	370.2	98.1	25.000	13.979	23.02	38.76
270.00	368.8	99.6	25.000	13.979	23.18	39.00
315.00	380.2	88.1	25.000	13.979	21.83	36.97

Radiation Center (AMSL): 468.3 meters 1536.5 feet
Average Terrain (AMSL): 368.3 meters 1208.5 feet
Radiation Center (HAAT): 100.0 meters 328.1 feet
Area Within 70.0 dBu F(50,50) Contour is 652.5 sq. mi. or 1690.0 sq. km
Area Within 60.0 dBu F(50,50) Contour is 1844.9 sq. mi. or 4778.3 sq. km
Population Within 60.0 dBu F(50,50) Contour is 40181

Big Country Radio, Inc.

College Station, TX

EXHIBIT E-II

Page 6

Distance to Contour

Title: KLXK Present

Audit File: con10087.A02

Based on 30 Second Terrain Data

Reference City: Breckenridge, TX

Latitude: 32-46-55

Longitude: 98-56-22

True Radial Bearing	Radiation Center Average Elevation	Height Above Average Terrain	Effective Radiated Power	Distance to Contour 60.0 dBu F(50,50)
Degrees	meters	meters	kW dBk	km
0.00	353.8	156.2	12.500 10.969	40.83
45.00	362.5	147.5	12.500 10.969	39.78
90.00	384.9	125.1	12.500 10.969	37.06
135.00	389.6	120.4	12.500 10.969	36.49
180.00	385.1	124.9	12.500 10.969	37.03
225.00	380.5	129.5	12.500 10.969	37.58
270.00	366.8	143.2	12.500 10.969	39.25
315.00	372.8	137.2	12.500 10.969	38.52

Radiation Center (AMSL): 510.0 meters 1673.2 feet

Average Terrain (AMSL): 374.5 meters 1228.7 feet

Radiation Center (HAAT): 135.5 meters 444.5 feet

Area Within 60.0 dBu F(50,50) Contour is 1782.7 sq. mi. or 4617.1 sq. km

Population Within 60.0 dBu F(50,50) Contour is 13168